

Private and Nonpublic Data

Be aware that the financial records and other grant files that you keep may contain private and nonpublic data. Private data are data identifying an individual that are only available to the individual or with the individual's consent (for example, social security numbers, or documentation of an individual's low income status). Nonpublic data are data on a business or other entity that are only available to the subject of the data or with the subject's consent (for example, bank account or credit card information). For more information on these categories and the Minnesota Data Practices Act, see <http://www.house.leg.state.mn.us/hrd/pubs/dataprac.pdf>.)

You are in compliance with the Minnesota Data Practices Act if you collect and store data on individuals only as needed to administer programs authorized by law (Minn. Stat. § 13.05, subd. 3). For example, if you need to verify low-income status for a cost-share payment, you may collect and store evidence of that status. Indeed, BWSR may collect private and nonpublic data to verify compliance to the terms of the grant agreement, and we may need to store data to answer to our own auditors. If you store private and nonpublic data, you should limit access to them to those with a need to know. Documentation that is stored electronically, without controlled access, should have all private and nonpublic data redacted or blacked out before scanning.